

# Robert W. Seiden

Court-Appointed Temporary Receiver for Link Motion Inc.  
Pursuant to The Honorable Judge Victor Marrero of the  
United States District Court, Southern District of New York

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## VIA ECF

Hon. Valerie Figueredo  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

May 24, 2023

Re: *Baliga, et al. v. Link Motion Inc., et al.*, 1:18-cv-11642-VM-VF

Dear Judge Figueredo,

I write in response to your Honor's April 25, 2023 Order (ECF 410) granting Defendant Vincent Wenyong Shi's ("Shi") letter motion for relief and directing my office to file the Category 3 Documents on the public record in this action. The Category 3 Documents are documents relating to Mr. Lilin "Francis" Guo's ("Mr. Guo") court-approved note agreement. ECF 319 at 1. Simultaneously with submitting this letter, my office files all Category 3 Documents on the public docket. The chart below lists these documents, together with a description of each document and (where applicable) the original ECF number.

ECF No.	Original Filing Date (Sealed)	Original ECF Number (Sealed)	Description of Document
419-1	6/18/2019	N/A	Receiver's letter requesting the Court's approval of proposed note agreement between LKM and Mr. Guo (ECF 71) (the "Note").
419-1	6/25/2019	74	Court endorsement approving the Note
419-2	1/14/2020	119	Receiver's letter to the Court stating that under the Note, there is no requirement for Mr. Guo to cover receivership expenses outside of mainland China
419-2	1/17/2020	120	Court endorsement approving of Receiver's letter dated January 14, 2020
419-3	6/1/2020	N/A	Receiver's letter requesting the Court's approval to convert the outstanding loan balance under the Note into LKM's Class B shares.
419-4	6/5/2020	N/A	Court order approving Receiver's application for conversion of the outstanding loan balance under the Note to LKM's Class B shares.
419-5	6/19/2020	N/A	Receiver's application to the Grand Court of the Cayman Islands ("Cayman Court") seeking approval

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ECF No.	Original Filing Date (Sealed)	Original ECF Number (Sealed)	Description of Document
			of conversion of LKM shares that would be issued to Mr. Guo pursuant to the Note.
419-6	7/14/2020	N/A	Cayman Court Order approving conversion of Mr. Guo's LKM shares.
419-7	7/22/2020	N/A	LKM's Board resolution that issued Class B shares to Mr. Guo
419-8	8/30/2021	255	Receiver's letter requesting the Court's approval to convert the outstanding loan balance under the Note into LKM's Class B shares.
419-9	9/8/2021	256	Court order approving Receiver's application for conversion of the outstanding loan balance under the Note to LKM's Class B shares.
419-10	9/13/2021	N/A	Receiver's application to the Cayman Court seeking approval of conversion of LKM shares that would be issued to Mr. Guo pursuant to the Note.
419-11	10/14/2021	N/A	Cayman Court Order approving conversion of Mr. Guo's LKM shares.
419-12	10/19/2021	N/A	LKM's Board resolution that issued Class B shares to Mr. Guo

Please do not hesitate to contact me via email or telephone if you Honor wishes to discuss this matter in more detail.



Robert W. Seiden, Esq.  
Court-Appointed Temporary Receiver for Link Motion Inc.

cc: All Parties (via ECF)